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So Ordered on this 9th day of July, 2020.



LOIS H. GOODMAN, U.S.M.J.

July 9, 2020

Via Electronic Mail

Hon. Lois H. Goodman, U.S.M.J.
United States District Court for the
District of New Jersey
402 East State Street
Trenton, NJ 08625

Re: **Microbilt Corporation v. Bail Integrity Solutions, Inc. et al**
Civil Action No. 3:19-cv-0637 (MAS)(LHG)

Dear Magistrate Judge Goodman:

This Firm represents defendants, Bail Integrity Solutions, Inc. and Brian Shirah. I am writing to request an extension on the July 10, 2020 deadline in the Scheduling Order for the filing of motions to amend the pleadings and join parties.

As Your Honor knows from our recent conference call, the parties are proceeding with discovery of certain former employees of Bail Integrity Solutions. Plaintiff is issuing a subpoena *duces tecum* this week to those employees, and the plan is to take these depositions in late July or early August. Because those depositions may be critical in determining the basis for any third party claims, we believe that a further extension of this deadline is appropriate. At this time, we are not seeking any extension of any other deadlines set in the Scheduling Order.

I have conferred with Microbilt's counsel and Microbilt consents to this request. Accordingly, we respectfully request that the deadline of July 10, 2020 for the filing of motions to amend the pleadings or join parties be extended to August 10, 2020.

Respectfully,

STARK & STARK
A Professional Corporation

By: /s/ Craig S. Hilliard
CRAIG S. HILLIARD

CSH/emp

cc: Jeffrey Jacobovitz, Esq. (via electronic mail)